

Exhibit B

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

REX COMPUTING, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 21-525 (MN)
)	
CEREBRAS SYSTEMS INC.,)	
)	
Defendant.)	

PLAINTIFF REX COMPUTING, INC.'S INITIAL CLAIM CHARTS

Pursuant to Paragraph (7)(c) of the Court's Scheduling Order (D.I. 22), Plaintiff Rex Computing, Inc. ("Rex") serves its initial claim charts for U.S. Patent No. 10,355,975 ("the '975 patent") on Defendant Cerebras Systems Inc. ("Cerebras").

Rex's investigation of Cerebras' infringement is ongoing, and these initial claim charts are based on information presently available to Rex. In particular, fact discovery has just begun, Cerebras has made only a limited production of core technical documents, and no claim construction order has been issued. Consistent with the Scheduling Order, the Local Rules of the District of Delaware, and the Federal Rules of Civil Procedure, Rex reserves the right to amend and/or supplement these disclosures, including to amend or supplement the list of asserted claims, the accused instrumentalities, and/or the bases for infringement, as additional evidence and information become available, and as necessary in view of any future claim constructions and other orders of this Court, or as otherwise appropriate. In particular, Rex reserves the right to supplement its disclosure to assert infringement of claims currently not addressed and to identify specific doctrine of equivalents arguments that arise as a result of any claim construction proposed by Cerebras or adopted by the Court.

Based on the information currently available and subject to any amendment or supplementation, Rex asserts claims 1-5 and 7-19 of the '975 patent (collectively, the "Asserted Claims"). For each limitation of the Asserted Claims, the attached claim charts at Exhibit A provide evidence relating to the accused Cerebras CS-1 and CS-2 deep learning systems (the "Accused Products").

Rex contends that Cerebras has directly infringed and continues to directly infringe the Asserted Claims under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, by making, using, offering to sell, selling, and/or importing into the United States at least the Accused Products.

In addition, Rex contends that Cerebras has infringed and continues to infringe the Asserted Claims under 35 U.S.C. § 271(b) by actively inducing others, including customers, to use the Accused Products. Cerebras knew or should have known of the '975 patent at least as early as June 26, 2020, when Cerebras used Rex's technical information in a webinar presentation. Further, at the very latest, Cerebras had actual knowledge of the '975 patent and Cerebras's infringement thereof when Rex sent a notice letter of the same and later filed the Complaint in this action in April 2021.

Further, Rex contends that Cerebras has contributed to and continues to contribute to the infringement of the Asserted Claims under 25 U.S.C. § 271(c) by others, including customers, by offering to sell, selling, and/or importing into the United States the Accused Products, each of which is a component or a patented system and which constitutes a material part of the invention of the Asserted Claims. As discussed above, Cerebras knew or should have known that use of the Accused Products would infringe the Asserted Claims. The Accused Products are specifically made or especially adapted for use in the infringement of the Asserted Claims, and the Accused Products are not staple articles or commodities of commerce suitable for substantial non-infringing use.

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CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2021, copies of the foregoing were caused to be served upon the following in the manner indicated:

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